

STATE OF ILLINOIS POLLUTION CONTROL BOARD SEPTEMBER 14, 1976

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PCB No. 76-3/3
EPA 3931

PETITION FOR VARIANCE

Comes now OLIN CORPORATION, a Virginia corporation duly authorized to do business in the State of Illinois, through its attorney, and hereby petitions for a variance from Air Pollution Control Regulations:

104, Compliance Programs and Project Completion Schedules;

203(e), Particulate Emission Standards and Limitations for Incinerators; and

206(b), Carbon Monoxide Emission Standards and Limitations, Incinerators, based upon the following facts.

1. Petitioner operates industrial facilities leased from the U. S. Government in the former U. S. Army Ordnance Plant near the City of Marion,
Williamson County, Illinois. Various propellant and pyrotechnic devices are manufactured at this location for the U. S. Department of Defense and for export to foreign governments.

2. Contracts for such items are let by the Government annually on competitive bid. Under these circumstances it is impossible to state with certainty what Petitioner's product line will be. However, the maximum amount of explosive refuse to be generated per week can be estimated as follows:

Ammonium Nitrate Propellant	500 lbs.
Double Base Propellant	300 lbs.
RDX Type Explosive	200 lbs.
Single Base Propellant	20 lbs.
Ammonium Perchlorate Propellant	20 lbs.
Boron-Potassium Nitrate Propellant	200 lbs.
Black Powder	10 lbs.
Nitroglycerine in Sawdust	25 lbs.
Potassium Perchlorate Propellant	20 lbs.
Firecracker Mix	50 lbs.
Colored Smoke Mix	100 lbs.
Contaminated Packaging	200 lbs.
Pyrotechnic Flare Scrap	50 lbs.
Fuzes, primers and explosive projectiles of	
intermediate caliber ammunition	1,000 lbs.

Activities such as machine cleaning, floor sweeping and rejected product create these estimated amounts of explosive refuse.

3. An incinerator to dispose of explosive refuse has been designed and constructed by Petitioner on approximately 290 acres of strip mine spoil lands near Marion in Williamson County. Exhibit "A" attached hereto and made a part hereof is the Construction Permit Application for the incinerator which was filed with the Environmental Protection Agency on January 21, 1974. Contaminants discharged by the incinerator and the air pollution control device used are described in Exhibit "A".

Certain errors in the original test data concerning emissions have been

discovered and corrected in a report of Howard E. Hesketh, P.E., dated
September 17, 1975 and attached to Exhibit "A".

4. A retort for disposal of fuses, primers and explosive projectiles from intermediate caliber ammunition has also been constructed on the site.

Both the retort and the incinerator use the same air pollution control device.

Exhibit "B" attached hereto and made a part hereof is a Construction Permit Application describing the retort, emissions from its operation and the air pollution control devices used. This retort was actually constructed as an experimental incinerator under open burning application.

No. B 305029 issued by the Agency.

5. Air pollution from use of the incinerator of Exhibit "A" and the retort of Exhibit "B" is small. However, existing incinerator emission standards are based upon the technology for burning municipal type solid waste.

Municipal waste requires little excess air and contains enough carbon to generate carbon dioxide when burned in an incinerator. Thus, regulation 203(e) requires a particulate emission standard based upon a correction to 12% carbon dioxide, and rule 206(b) requires a carbon monoxide standard corrected to 50% excess air. Unfortunately, explosive incineration requires a large amount of excess air and generates little or no carbon dioxide. As a result the correction factors required for municipal incinerators work a severe penalty on incinerators burning explosives. Attached hereto as Exhibit "C" and made a part hereof is a Petition to Amend Regulations which Petitioner is presently circulating for the necessary 200 signatures. This

proposed change addresses the problem of accurately measuring contaminants from incinerators burning explosives.

Actual quantities of contaminants released are computed to be:

Particulates:

Incinerator (Exhibit "A")

Retort (Exhibit "B")

2.3 lbs. per hour

2.9 lbs. per hour

Carbon Monoxide:

Incinerator (Exhibit "A")

Retort (Exhibit "B")

19. 6 lbs. per hour.

3. 6 lbs. per hour.

A changing rate of 400 lbs. per hour for the incinerator and 500 lbs. per hour for the retort are used in calculating these emissions. Maximum operating time per week is 20 hours for the incinerator and 2 hours for the retort. They are not operated simultaneously.

- 6. Incineration of explosive refuse represents an advance in the state of the art. Open burning is still the commonly accepted safe disposal practice. Petitioner has no plan to bring its incinerators into compliance with existing emission standards, but seeks a Board hearing on proper emission standards for incinerators burning explosive waste.
- 7. The Board has determined several times in the past that imposition of existing air pollution control regulations on the disposal of explosive wastes would constitute an arbitrary and unreasonable hardship. Petitioner's prior variances for this problem are:

VR 67-60 of the Illinois Air Pollution Control Board, PCB 71-60,

PCB 71-371,

PCB 72-357,

PCB 72-517,

PCB 73-395,

PCB 74-335, and

PCB 75-333.

Open hearings have been held at East St. Louis under VR67-60, and at Marion under PCB 71-60 and PCB 73-395.

These prior variances have established that open burning is the accepted safe practice for explosive disposal. Petitioner's incineration method significantly reduces air pollution when compared with open burning, and no alternate safe means of disposal are known.

8. Primary air quality standards for particulates are 75 micrograms per cubic meter (annual geometric mean) and 260 micrograms per cubic meter (maximum 24 hour concentration), 40 C.F.R. 50.6. Marion, Illinois is listed on page 117 of the Illinois Air Quality Report, 1975, as having 46 micrograms per cubic meter (annual geometric mean) and less than 150 micrograms per cubic meter (highest sample reading).

Petitioner's incinerator is calculated to generate up to 2.3 lbs. of particulate per hour for a maximum of 20 hours per week. The retort will generate up to 2.9 lbs. of particulates per hour for a maximum of 2 hours per week. These devices do not operate simultaneously. Such low levels of particulate generation will cause no harm to the public and will not pre-

vent the attainment of national ambient air quality standards in the surrounding area.

9. Carbon monoxide emissions under this variance can reach a maximum of 19.6 lbs. per hour for 20 hours a week during operation of the incinerator (Exhibit "A"). Dispersion estimates have been made in accordance with Public Health Service Publication No. 999-AP-26. Maximum carbon monoxide concentration resulting from this variance under worst climatic conditions with a 5 mph wind will occur approximately 0.3 mile from the stack. Concentration at this distance would be 0.82 ppm. National ambient air quality standards permit an 8 hour concentration of 9.00 ppm and a 1-hour concentration of 35.00 ppm. No residences are located within 0.3 mile from the stack.

The <u>Illinois Air Quality Report</u>, 1975, states that motor vehicles are the major source of carbon monoxide, and no data was collected for carbon monoxide in Rural Air Quality Control Region 74 which contains Marion, Illinois.

Petitioner estimates that this variance would generate approximately the same amount of carbon monoxide on an annual basis as one family automobile.

No harm to the public can be caused by such a level of emissions, and the area will be able to meet national ambient air quality standards.

WHEREFORE, Petitioner seeks a variance for five years from the requirements of Air Pollution Regulations:

(1) 104, which requires a compliance program and project completion

schedule as a condition to obtaining operating permits for Petitioner's incinerator and retort;

- (2) 203(e), which imposes particulate emission standards that explosive burning incinerators are unable to meet; and
- (3) 206(b), which imposes carbon monoxide emission standards that explosive burning incinerators are unable to meet.

Respectfully submitted,

Patrick O. Boyle

Attorney at Law

STATE OF ILLINOIS)	SS
COUNTY OF WILLIAMSON)	
BEFORE THE ILLINO	IS POLLUTION CONTROL BOARD
OLIN CORPORATION,)
a Virginia Corporation,)
)
Petitioner,)
)
VS.) PCB No
THE STATE OF ILLINOIS,)
ENVIRONMENTAL PROTECT	PION)
AGENCY,	*
•)
Respondent)

APPEARANCE

The undersigned as an attorney duly licensed and registered to practice in the State of Illinois hereby enters an Appearance in behalf of Petitioner, Olin Corporation.

OLIN CORPORATION

Patrick O. Boyle

Suite 250

Berkshire Building 707 Berkshire Avenue East Alton, Illinois 62024

(618) 258-2603

September 14, 1976 Dated:

CERTIFICATE OF MAILING

I hereby certify that I did, on September 14, 1976 serve the attached document upon the Environmental Protection Agency by placing in an envelope addressed to the State of Illinois, Environmental Protection Agency, 2200 Churchill Road, Springfield, Illinois 62706, with sufficient postage affixed, certified mail, return receipt requested; said envelope being deposited in the United States mail at East Alton, Illinois on September 14, 1976.

Patrick O. Boyle

Attorney at Law



STATE OF THE HOUS ENVIRONMENTAL PROTECTION AGENCY DIVISION OF AIR POLLUTION CUNTROL 2200 CHURCHILL ROAD SPRINGFIELD, ILLINOIS 62706

RICHARD & GOILVIE, GOVERNOR WILLIAM L. BLASER, DIRECTOR

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IPC-92

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APC-92 EXHIBIT A

Construction Permit Application #C 3 02 039, I.D. #199 055 AAR was denied by the Illinois Environmental Protection Agency on March 12, 1973. On December 18, 1973, Variance PCB-395 was granted to the Olin Corporation by the Illinois Pollution Control Board. This variance allows operation of the device covered by Application #C 3 02 039 contingent on obtaining an Operating Permit from the agency. The Olin Corporation, by this submission, applies for such an Operating Permit. A copy of original application #C 3 02 039 is attached for reference.



APC-63

APC-61

A -104 Adiendum 3 pages ... 6 pages

- 1 page

Test Report - 16 pages

STATE OF HEIMOIS ENVIRONMENTAL PROJECTION AGENCY DIVISION OF AIR POLEUTION CONTROL 2200 CHERCHIEL ROAD SPRINGHELD, REINGIS 62706

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Pyrotechnic Waste

Magnesium Oxide

- 58% Magnesium Powder 37% Sodium Nitrate

OF EMISSION SOURCE:

- 5% Organic Binder
- plus sufficient #2 fuel oil to wet waste for safety reasons

400

LB/KR

LB/HZ

L3/H2

- Solid Propellant Waste b.

 - 75% Ammonium Nitrate 15% Synthetic Rubber 10% Various Organic Chemicals

300

JUNE/AUG _251

LB/HR

LB/HR